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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EDYTHE MAXINE HARTMAN, a
Nevada Resident;

Plaintiff,

vs.

UTC FIRE & SECURITY AMERICAS
CORPORATION, INC. d/b/a
INTERLOGIX, a Corporation; ADT LLC
OF DELAWARE d/b/a ADT, a Foreign
Limited-Liability Company; JOHNSON
CONTROLS SECURITY SOLUTIONS
LLC d/b/a ADT SECURITY SERVICES,
INC., a Foreign Limited Liability
Company; CARRIER FIRE &
SECURITY AMERICAS
CORPORATION, formerly, UTC FIRE
& SECURITY AMERICAS
CORPORATION, INC., a Delaware
Corporation; GENERAL ELECTRIC
d/b/a GE, a New York Domestic Business
Corporation; ROE MANUFACTURER;
ROE COMPONENT PARTS
MANUFACTURER; ROE
DISTRIBUTOR; ROE ADT SECURITY
DEALER; ROE ADT PRODUCT
INSPECTOR; ROE ADT PRODUCT
DESIGNER; DOES 1-20; and ROE

CASE NO: 2:20-cv-01968-JCM-DJA

**PLAINTIFF'S STIPULATION
FOR AN EXTENSION OF TIME
TO FILE HER RESPONSES TO
DEFENDANT JOHNSON
CONTROLS SECURITY
SOLUTIONS LLC'S MOTION TO
DISMISS AND DEFENDANT ADT
LLC OF DELAWARE'S MOTION
TO DISMISS**

[FIRST REQUEST]

BUSINESS ENTITIES 1-20, inclusive,
Defendants.

The parties hereby stipulate and agree to a seven (7) day extension of time for Plaintiff Edythe Maxine Hartman to file her responses to Defendant Johnson Controls Security Solutions LLC's Motion to Dismiss and Defendant ADT LLC of Delaware's Motion to Dismiss, and for JCSS and ADT (collectively the "Defendants") to have a seven (7) day extension of time to file their respective reply briefs. Defendants' underlying motions to dismiss were filed on January 19, 2021. Plaintiff and Defendants respectfully request that the Court approve the parties' stipulation for the following reasons:

1. Plaintiff filed her Complaint on September 18, 2020 in the Eighth Judicial District Court in Clark County, Nevada, Case No. A-20-821415-C.
2. On October 23, 2020, Defendants filed their Notice of Removal to this Court.
3. Per stipulation by the parties and under Order of this Court, Plaintiff filed her First Amended Complaint on January 4, 2021, naming additional Defendants.
4. On January 19, 2021, Defendant ADT LLC OF DELAWARE filed its Motion to Dismiss [ECF 15]. That same day, Defendant JOHNSON CONTROLS SECURITY SOLUTIONS LLC filed its Motion to Dismiss [ECF 14].
5. Since there are two pending dispositive motions [ECF 14 and 15] (the "Motions") filed by Defendants that Plaintiff considers critical parties to this action and the allegations within Plaintiff's Complaint, and Plaintiff asserts the Motions involve complex legal and factual issues, the parties have agreed to allow Plaintiff an additional seven (7) days to respond to both Motions, with Defendants' having 14 days after Plaintiff responds to file their replies.

Counsel for Plaintiff and Defendants therefore respectfully request that the Court approve the parties' stipulation for a seven (7) day extension for Plaintiff to respond to the Motions [ECF 14 and 15], and a seven (7) day extension for Defendants to reply to Plaintiff's responses. Plaintiff's responses to the Motions would be due on or before February 9, 2021; and that JCSS and ADT shall file their reply briefs on or before February 23, 2021.

This is the parties' first request for an extension of time to respond to the Motions. The parties seek this extension of time in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 1st day of February, 2021.

MAINOR WIRTH, LLP

/s/ Breanna Hartmann

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ORDER

In light of the foregoing and upon a finding of good cause, it is hereby ORDERED that the deadline for Plaintiff to respond to Defendants' pending Motions [ECF 14 and 15] shall be on or before February 9, 2021, and Defendants' reply briefs shall be due on or before February 23, 2021.

IT IS SO ORDERED.

DATE: February 3, 2021


UNITED STATES DISTRICT JUDGE